

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re LANTUS DIRECT PURCHASER
ANTITRUST LITIGATION

Civil Action No. 16-cv-12652-LTS-JCB

**ASSENTED-TO MOTION FOR LEAVE FOR KIERSEN M. COMMONS TO
WITHDRAW AS COUNSEL FOR DEFENDANT**

Pursuant to Local Rule 83.5.2(c), the undersigned counsel moves for the withdrawal of appearance of Kiersen M. Commons as counsel for defendant Sanofi-Aventis U.S. LLC. The grounds for this motion are as follows.

1. After January 24, 2025, Ms. Commons will depart Jones Day.
2. Co-counsel, including Julie E. McEvoy, Rosanna K. McCalips, Theresa C. Martin, Kate Wallace, Michelle K. Fischer, and Brian K. Grube of Jones Day, who are admitted to the bar of or admitted *pro hac vice* to practice before this Court, will continue to represent defendant in this matter.
3. Local Rule 83.5.2(c)(1)(D) requires leave of court when “any reports, written or oral, are due.” Pursuant to the Court’s Electronic Order Granting the Parties’ Joint Motion to Amend the Scheduling Order (ECF Doc. 554) opening expert reports on Economic Issues are due to the Court.
4. Leave to withdraw as counsel is “a matter addressed to the discretion of the trial court.” *Andrews v. Bechtel Power Corp.*, 780 F.2d 124, 135 (1st Cir. 1985).
5. The Court should exercise its discretion because no prejudice will result from granting the relief requested herein. Defendant continues to be represented by numerous counsel and Ms. Commons’ withdrawal will not prejudice defendant or delay compliance with the Court’s orders.
6. Counsel for plaintiffs have no objection to the relief requested by this motion.

RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), counsel for Defendant conferred with counsel for Plaintiffs regarding the above motion who do not object to the relief requested herein.

Dated: January 22, 2025

Respectfully submitted,

/s/ Kiersen Commons

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 22, 2025.

Dated: January 22, 2025

/s/ Kiersen Commons
Kiersen M. Commons